

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE: § CASE NO. 24-51101-MMP

TIMEKEEPERS, INC. §
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Debtor. §
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§
§
CHAPTER 11

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE
AND SERVICE OF ALL DOCUMENTS**

Please take notice that, pursuant to Section 1109(b) of Title 11 of the United States Bankruptcy Code and Rule 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned attorneys do hereby appear as counsel for Advantage Business Capital, Inc. d/b/a Far West Capital (“FWC”), secured creditor and party-in-interest in the above-captioned chapter 11 case.

Please take further notice that, pursuant to Bankruptcy Rules 2002, 3017, 4001, 9001, 9007 and 9010, and pursuant to Section 342 of Title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Code”), hereby requests that all documents filed with the Court, all notices given or required to be given in the debtor’s case, and all papers served or required to be served in this case, be given and served upon the following, and that appropriate entry thereof be made on any creditor’s matrix or list of creditors in this case:

James. M. Schober
Teresa Ruiz Schober
SCHOBER & SCHOBER, P.C.
1611 Nueces Street
Austin, Texas 78701

Tel: 512.474.7678
Fax: 512.498.1333
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Email: teresa@schoberlegal.com
Email: cindy@schoberlegal.com

Please take further notice that this request includes not only the notices and papers referred to in the Rules and the Code provisions specified above, but also includes all orders, notices, hearing dates, applications, and other documents that affect or seek to affect in any way the rights or interests of any creditor or party in interest in this case, including without limitation Advantage Business Capital, Inc. d/b/a Far West Capital.

Please take further notice that Advantage Business Capital, Inc. d/b/a Far West Capital does not intend this notice or any later appearance or pleading, be deemed or construed a waiver of its rights: (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) to trial by jury in any proceeding so triable; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) to require that notice be served upon any other person, firm or governmental agency; and (v) to any rights, claims, actions, defenses to which he is or may be entitled, in law or equity, all of which rights, claims, actions, or defenses expressly reserves.

Please take final notice that this notice shall not be construed as an appointment of James M. Schober, Teresa Ruiz Schober, or Schober & Schober, P.C. as authorized agent of or for Advantage Business Capital, Inc. d/b/a Far West Capital either expressly or impliedly, for purposes of receiving service of process pursuant to Rule 7004 of the Federal Rules of Bankruptcy Procedure or Rule 4 of the Federal Rules of Civil Procedure.

Respectfully submitted,

SCHOBER & SCHOBER, P.C.
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512.474.7678
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/s/ Teresa Ruiz Schober
Teresa Ruiz Schober
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*Attorneys for Advantage Business Capital,
Inc. d/b/a Far West Capital*

CERTIFICATE OF SERVICE

The undersigned certifies that on June 12, 2024, a true and correct copy of the preceding was served to all parties requesting notice via the Court's CM/ECF system, on all persons consenting to such service, and on the persons indicated below.

Via U.S. Mail
Timekeepers Inc.
1015 S SCHOOL ST
Boerne, TX 78006
Debtor

Via CM/ECF
Morris Eugene
White, III
Villa & White LLP
100 NE Loop 410
Suite 615
San Antonio, TX
78216
Debtor's Attorney

Via CM/ECF
Office of the United States Trustee
Aubrey L. Thomas,
Assistant U.S. Trustee
615 E. Houston Street, Suite 533
San Antonio, TX 78205

/s/ Teresa Ruiz Schober
Teresa Ruiz Schober